



October 25, 2016

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: NOTICE OF EX PARTE**  
**PS Docket No. 07-114: *Wireless E911 Location Accuracy Requirements***

Dear Ms. Dortch:

On October 21, 2016, Rebecca Murphy Thompson and I with Competitive Carriers Association (“CCA”)<sup>1</sup> met with Timothy May, David Siehl, and Michael Connelly of the Federal Communications Commission’s (“FCC” or “Commission”) Public Safety and Homeland Security Bureau (“Bureau”) to discuss the above-referenced proceeding. During the meeting, CCA described how its members continuously work to improve location accuracy technology and access to information in times of emergency for the benefit of all consumers and emergency authorities. In compliance with requirements set forth in the *Fourth Report and Order*, CCA discussed its members’ ongoing progress to catalog and report aggregate live 911 call data in advance of the February 2017 deadline.<sup>2</sup>

CCA supports the FCC’s goal to evaluate the performance of individual location technologies within different morphologies by acquiring live 911 call data from nationwide and non-nationwide providers.<sup>3</sup> To that end, CCA offered several recommendations to promote uniform reporting. First, CCA supports the proposal submitted by CTIA outlining a consistent format for reporting relevant data.<sup>4</sup> As the *Fourth Report and Order* encourages, CCA will continue to work with

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<sup>1</sup> CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents approximately 200 associate members consisting of businesses, vendors, and suppliers that serve carriers of all sizes.

<sup>2</sup> To demonstrate further compliance with these metrics, CMRS providers must submit aggregated live 911 call data from the six cities recommended for indoor testing by ATIS. *Wireless E911 Location Accuracy Requirements*, Fourth Report and Order, PS Docket No. 07-114, FCC 15-9 ¶ 21 (rel. Feb. 3, 2015) (“*Fourth Report and Order*”).

<sup>3</sup> Nationwide CMRS providers must aggregate live 911 call data on a quarterly basis; non-nationwide providers must file on a biannual basis. *See id.* ¶¶ 136-137

<sup>4</sup> *Ex Parte* Letter from Matthew Gerst, Director Regulatory Affairs, CTIA, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 07-114 (filed Sept. 21, 2016).

industry stakeholders to reach a consensus for organizing reports, and agrees that a table-format will expedite and streamline the filing process for both carriers and the Commission.<sup>5</sup> For ease of submission, CCA encouraged the Bureau to initiate a common docket or designated email address where these reports could be confidentially submitted.<sup>6</sup>

Similarly, CCA encouraged the Commission to release a Public Notice with specific guidance and additional instructions for filing aggregate live 911 call data prior to the February 2017 deadline. Specifically, the Commission should publish ATIS's definitions for each of the morphologies – dense urban, urban, suburban, and rural – to aid competitive carriers' ability to accurately determine the relevant test area and ultimately submit accurate live 911 call data reports. Indeed, many of CCA's members do not participate in ATIS and therefore have limited knowledge of the standards process. The FCC should provide a brief overview in this Public Notice of the definitional standards, accompanied by images of the test cities and morphologies, to facilitate a more transparent reporting regime.

CCA also encouraged the Commission to conduct outreach to vendors that may be implementing software to help carriers synthesize aggregate live 911 call data. For example, CCA member West has created a "Location Management Performance" software that gathers live 911 call data into a dashboard, to allow providers to catalog these statistics in an organized manner. While costs must be considered, this type of tool could be valuable when finalizing a uniform report mechanism.

Finally, CCA's members have an ongoing interest in fostering adequate and reliable communication with Public Safety Answering Points ("PSAPs"). As the *Fourth Report and Order* notes, CMRS providers must submit call tracking data for all 911 calls delivered to a particular PSAP, upon request.<sup>7</sup> While CCA applauds a fluid information exchange, the Commission must be mindful of overly burdensome requests. With thousands of PSAPs across the country, the Bureau should ensure these reports are used for compliance and evaluation purposes only, and prevent information discovery outside the normal course of this proceeding. CCA's members look forward to working with PSAPs and other emergency authorities to promote open channels of communication and consumer safety during and after emergencies.

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<sup>5</sup> See *Fourth Report and Order* ¶ 189.

<sup>6</sup> Providers must submit these reports to the Association of Public-Safety Communications Officials, the FCC, National Emergency Number Association, and the National Association of State 911 Administrators. The Commission should streamline its submission process by identifying a single point of contact for all entities, in conjunction with a single docket or program for submitting all reports. See *id.* ¶ 36.

<sup>7</sup> See *id.* ¶ 191.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

*/s/ Courtney Neville*

Courtney Neville  
Policy Counsel  
Competitive Carriers Association

cc (via email): Timothy May  
David Siehl  
Michael Connelly